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June 24, 1991/2

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VIA FEDERAL EXPRESS

Chris Stubbs
South Coast Groundwater Section, H-6-4
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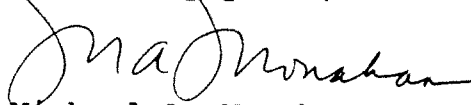
Re: Hawker Pacific Inc.
11310 Sherman Way
Sun Valley, California; EPA Reference T-4-1

Dear Mr. Stubbs:

Enclosed is the response of Hawker Pacific Inc. to
EPA's third request for information to it pertaining to the
above facility.

If you have any questions regarding this response,
please call me.

Very truly yours,


Michael A. Monahan

MAM/par

LL921760.171

MICHAEL A. MONAHAN
GIBSON, DUNN & CRUTCHER
333 South Grand Avenue
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Attorneys for
HAWKER PACIFIC INC.

BEFORE THE
UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

In re Hawker Pacific Inc.,) RESPONSE OF HAWKER
facility at 11310 Sherman) PACIFIC INC. TO THIRD
Way, Sun Valley, California;) EPA REQUEST FOR
San Fernando Valley) INFORMATION PURSUANT TO
Groundwater Investigation) CERCLA § 104(e)
<hr/>) EPA File No. 111.0436

This response is made by Hawker Pacific Inc. ("Hawker Pacific") to the request for information under CERCLA § 104(e), 42 U.S.C. § 9604(e) ("Third EPA Request"), made by the United States Environmental Protection Agency ("EPA") by letter dated May 14, 1992, addressed to David Loklar, regarding Hawker Pacific's facility at 11310 Sherman Way, Sun Valley, California 91352. Hawker Pacific has responded to two prior EPA requests for information by responses dated July 7, 1989 and June 14, 1991.

The person who provided information regarding the facility included in this document is Jeff B. Belzer, who is

currently a Hawker Pacific employee and who can be contacted through Hawker Pacific's undersigned counsel.

This response does not constitute any admission by Hawker Pacific that it has contributed to or is responsible for the San Fernando Valley groundwater contamination referred to in the EPA's request, and Hawker Pacific denies any such contribution or responsibility.

This response includes an exhibit as to which Hawker Pacific claims confidentiality pursuant to CERCLA § 104(e)(7)(E) and (F). The exhibit is enclosed in a separate envelope marked to indicate confidentiality.

Hawker Pacific objects to Instruction 3 of the Request insofar as it seeks to establish a continuing obligation upon Hawker Pacific to report information subsequently discovered or learned by Hawker Pacific, on the grounds that such a continuing request is beyond the scope of EPA authority under CERCLA § 104(e) and would be impracticable or impossible to implement.

Without waiving the foregoing qualifications and objections, Hawker Pacific further responds to the Requests as follows:

- 1. For all prior operators of the facility, provide copies of all documents relating to the use of trichlorethylene ("TCE") and tetrachlorethylene ("PCE") which were not provided previously to EPA in response to an Information Request.**

Hawker Pacific has no such documents other than those documents previously provided to EPA.

2. **Provide a copy of the asset purchase agreement executed by Hawker Pacific, Inc. and Inchcape, PLC on or about April 1, 1987, including any documents pertaining to that agreement.**

A copy of the agreement is attached as Exhibit 1.

Hawker Pacific claims confidentiality for Exhibit 1 pursuant to CERCLA § 104(e)(7)(E) and (F). The Exhibit is enclosed in a separate envelope marked to indicate confidentiality.

3. **Describe the relationship between Hawker Pacific, Inc. and Flight Accessory Services. Provide a copy of the asset purchase agreement executed by Hawker Pacific, Inc. and Flight Accessory Services on or about April 1, 1987. Also, include any documents pertaining to that agreement.**

Flight Accessory Services, Inc. was a subsidiary of Inchcape Plc. Hawker Pacific purchased certain assets of Flight Accessory Services, Inc. pursuant to the agreement attached as Exhibit 1.

4. **Provide a copy of the report dated November 26, 1990 prepared by Active Leak Testing, Inc. regarding environmental work completed at the facility.**

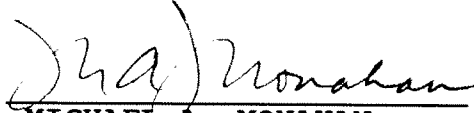
A copy of a report by that firm dated June 1990, which is referenced in a Law Environmental report previously supplied to EPA and dated November 26, 1990, is attached as Exhibit 2.

Dated: June 24, 1992

Respectfully submitted,

MICHAEL A. MONAHAN
GIBSON, DUNN & CRUTCHER

By:


MICHAEL A. MONAHAN

Attorneys for HAWKER PACIFIC
INC.

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BEFORE THE
UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

In re Hawker Pacific Inc.,) RESPONSE OF HAWKER
facility at 11310 Sherman) PACIFIC INC. TO THIRD
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<hr/>) EPA File No. 111.0436

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A copy of a report by that firm dated June 1990, which is referenced in a Law Environmental report previously supplied to EPA and dated November 26, 1990, is attached as Exhibit 2.

Dated: June 24, 1992

Respectfully submitted,

MICHAEL A. MONAHAN
GIBSON, DUNN & CRUTCHER

By:



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Attorneys for HAWKER PACIFIC
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VIA FEDERAL EXPRESS

Chris Stubbs
South Coast Groundwater Section, H-6-4
United States Environmental Protection Agency
Post Office Box 193062
San Francisco, CA 94119-3036

Re: Hawker Pacific Inc.
11310 Sherman Way
Sun Valley, California; EPA Reference T-4-1

Dear Mr. Stubbs:

Enclosed is a replacement page for page 3 of the
RESPONSE OF HAWKER PACIFIC INC. TO THIRD REQUEST FOR
INFORMATION PURSUANT TO CERCLA § 104(e) EPA File No.
111.0436, which we mailed to you yesterday. Please
substitute this page for the copy that you received, which
had dropped several words out of one of the answers.

Very truly yours,

Michael A. Monahan

Michael A. Monahan

MAM/par

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FX-4: CBI/Trade Secret

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HAWKER PACIFIC
11310 SHERMAN WAY
SUNLAND, CA 91352

6-14-90

JUNE 1990

SUBMITTED BY:

ACTIVE LEAK TESTING, INC.
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SITE LOCATION MAP
SCALE PLOT PLAN

APPENDICES

1. SOIL BORING PROTOCOL
2. UNIFIED SOIL CLASSIFICATION SYSTEM / BORING LOGS
3. SOIL SAMPLING PROTOCOL
4. LABORATORY RESULTS

1.0 INTRODUCTION

Active Leak Testing, Inc. (ALT) was retained by Hawker Pacific Company to perform a subsurface soil investigation of the property located at 11310 Sherman Way, Sunland, CA (see the Site Location Map in the Figures section). The soil investigation was accomplished by performing soil borings, in key locations, to provide information leading to the determination of the vertical and horizontal extent of the contamination plume.

1.1 SITE HISTORY

Hawker Pacific Company formerly operated one underground storage tank at this facility. The tank has a 280 gallon capacity, and contained waste oil. The tank is located within a concrete containment area with cinderblock walls five feet in height. The containment area also has a 12"x12"x36" sump located in the southeast corner (see plot plan located in the figures section).

1.2 GEOLOGY AND HYDROGEOLOGY

This facility is located in southern Sunland. The site is situated five miles south of Hansen Dam, five miles northeast of the Sepulveda Dam, four miles north of the Los Angeles River, two and one half miles east of the Tujunga Wash, and four miles north of the Santa Monica mountains.

The elevation of this site is 742 feet above sea level. The water table is approximately 270 feet below the surface at this site. The water table in well #4929 was found to be 265.1 feet below grade when last measured on October 28th 1989. This water well is located approximately one third mile northwest of Hawker Pacific. The surface topography slopes at a rate of approximately 50 feet per mile in a southeastern direction. The ground water gradient is ten feet per mile southeastern as well, and the rate of ground water flow is approximately 500 feet per year.

Structurally, the San Fernando Valley is an elongated basin bordered by the Santa Susannah and San Gabriel Mountains in the north, Verdugo Mountains in the east and Santa Monica Mountains in the south. Verdugo Fault is 2.5 miles northeast of the site. This concealed fault continues underground in a northwestern direction to the Los Angeles Reservoir. This is an active fault.

The Los Angeles River and its tributaries drain San Fernando Valley through the Los Angeles Narrows. A major tributary of the Los Angeles River, Tujunga Creek, flows in a southwesternly direction and drains the canyons and valleys in the San Gabriel Mountains. The Verdugo fault is known to be an effective barrier to eastward groundwater flow.

Unconsolidated Pleistocene alluvium and Recent alluvium are the principal water-bearing formations. The Saugus Formation, which underlies the Older alluvium, is made up of continental and marine deposits of conglomerates, sands, silts and clays and in part forms a groundwater reservoir.

The groundwater recharge from percolation is minimal from drainage channels as these are concrete-lined. There are a number of major spreading grounds for artificial recharge.

2.0 METHODS

The methods ALT practices for soil borings and soil sampling have been reviewed and approved by a State of California Registered Geologist. These practices are followed to insure the integrity of the information supplied by ALT upon completion of investigation.

2.1 SOIL BORINGS

ALT retains Datum Exploratory, Inc. when soil drilling is required. Datum operates a golf cart mounted drilling rig utilizing continuous flight hollow stem augers. All drilling and sampling equipment is steam cleaned prior to delivery to the site. A full description of the ALT soil boring protocol is provided in Appendix A and the boring locations are provided on the scale plot plan in the Figures section.

ALT maintains boring logs to record descriptions of the lithology penetrated by the boring. All changes in lithology are noted and soil types are described utilizing the Unified Soil Classification System (USCS). The USCS and boring logs are provided in Appendix 2.

2.2 SOIL SAMPLING

The purpose of the soil sampling protocol adopted and followed by ALT is to insure precision and accuracy of the chemical data. Sample integrity is maintained by using steam cleaned augers and core samplers. Core samples are recovered in laboratory washed brass sampling tubes.

During drilling procedures, three core samples are collected at five (5) foot intervals by use of a modified Porter sampler driven by a 140 pound down hole hammer. The uppermost sample provides ALT with a record of soil type and its variations. This sample is also screened for contamination by an Organic Vapor Analyzer (OVA) to provide initial indications of contamination. The bottom two samples are sealed, labeled and placed in an ice chest to maintain the integrity of the sample. A full description of the sample handling procedures are provided in the Soil Sampling protocol in Appendix 3.

Based on the information supplied by field screening of the samples, the Geologist chooses samples that may have indicated signs of contamination during the drilling and sampling process. These samples and the required laboratory analysis are recorded on a Chain-of-Custody document. This document stays with the samples until they are delivered to a State-Certified laboratory for analysis. The samples are usually delivered to the laboratory for analysis within 24 hours.

2.3 FIELD SCREENING

The uppermost sample, recovered from each five foot interval during the soil boring process, is placed in a plastic bag for field screening. The bag sample is screened for organic vapors with a portable Organic Vapor Analyzer (OVA) for indications of possible soil contamination. These readings are taken as the samples are recovered and are recorded on the individual boring logs for reference.

3.0 DISCUSSION

The borings made for this soil investigation were placed in locations which would most likely indicate the presence of any existing contamination. ALT also places boring locations that will provide a representative soil quality and lithology.

3.1 SOIL BORINGS

ALT proposed three soil borings near the facility underground storage tank on the Hawker Pacific property.

Three borings (B1, B2, and B3) in the area of the underground storage tank and sump were completed as proposed. B1 and B2 were advanced to a depth of 20 feet, and B3 was advanced to a depth of 15 feet.

The locations of the three borings in relation to the underground storage tanks and surrounding structures are provided on the site plot plan in the Figures section.

3.2 SOIL DESCRIPTION

The soils encountered were, in general, silty sands and coarse sand and gravel. The soil color was mainly light yellowish brown with some intermittent darker brown layers. The overall moisture content of the soil samples was low but some samples contained moderate moisture levels. Detailed soil descriptions are provided on the individual boring logs in Appendix 2.

3.3 FIELD SCREENING

Samples from the soil borings indicated the presence of contamination in field screening. The highest vapor level encountered was that of OFF THE SCALE for the one foot sample in boring B-3.

3.4 LABORATORY RESULTS

Samples were taken as follows: B1 - 15 feet and 20 feet, B2 - 15 feet and 20 feet and B3 - 1, 3, 5, 10 and 15 feet. All samples were analyzed by EPA Method 418.1 (Total Recoverable Hydrocarbons), and B3- 5 feet was also analyzed by EPA Method 8240 (Volatile Organics).

The 15 and 20 foot samples from B1 indicated 36.3 mg/kg Total Petroleum Hydrocarbons (TPH) each. The detection limit for TPH is 10.0 mg/kg.

The 15 and 20 foot samples from B2 indicated 220 mg/kg and 136 mg/kg TPH respectively. Again well over the detection limit of 10.0 mg/kg.

For boring number three, samples were taken at depths of 1,3,5,10 and 15 feet. Results for TPH are as follows: 1 foot - 38, 637, 3 foot - 22,251, 5 foot - 3,245, 10 foot - 17,104, and 15 foot - 354. Again all results are in mg/kg TPH. B3 - five foot was also analyzed Volatile Compounds (GC/MS). Detectable results (over 5.0 ppb) were found for the following constituents: 1,1,1, - Trichloroethylene (6.6 ppb), Trichloroethylene (19.2 ppb), Toluene (550,000 ppb), Trichloroethylene (550,000 ppb) and Xylenes [(total) 584 ppb].

The laboratory documentation of analysis and results, along with the Chain-Of-Custody documentation, is provided in Appendix 4.

4.0 CONCLUSIONS

It is concluded that:

1. The subsurface soils near and around the underground storage tank and sump are contaminated with Petroleum Hydrocarbons in excess of the set action limits.

5.0 RECOMMENDATIONS

It is recommended that:

1. Further subsurface soil investigation be performed in the area of the underground storage tank and sump at this facility to better determine the vertical and horizontal extent of the contamination plume.

6.0 LIMITATIONS

The conclusions and recommendations in this report are based on:

1. Information supplied to ALT by the Client.
2. The organic vapor measurements acquired on this site.
3. The test borings performed at this site.
4. Analysis performed by a State-Certified laboratory.
5. The observations of field personnel.
6. Underground storage tank regulations for the County of Los Angeles.

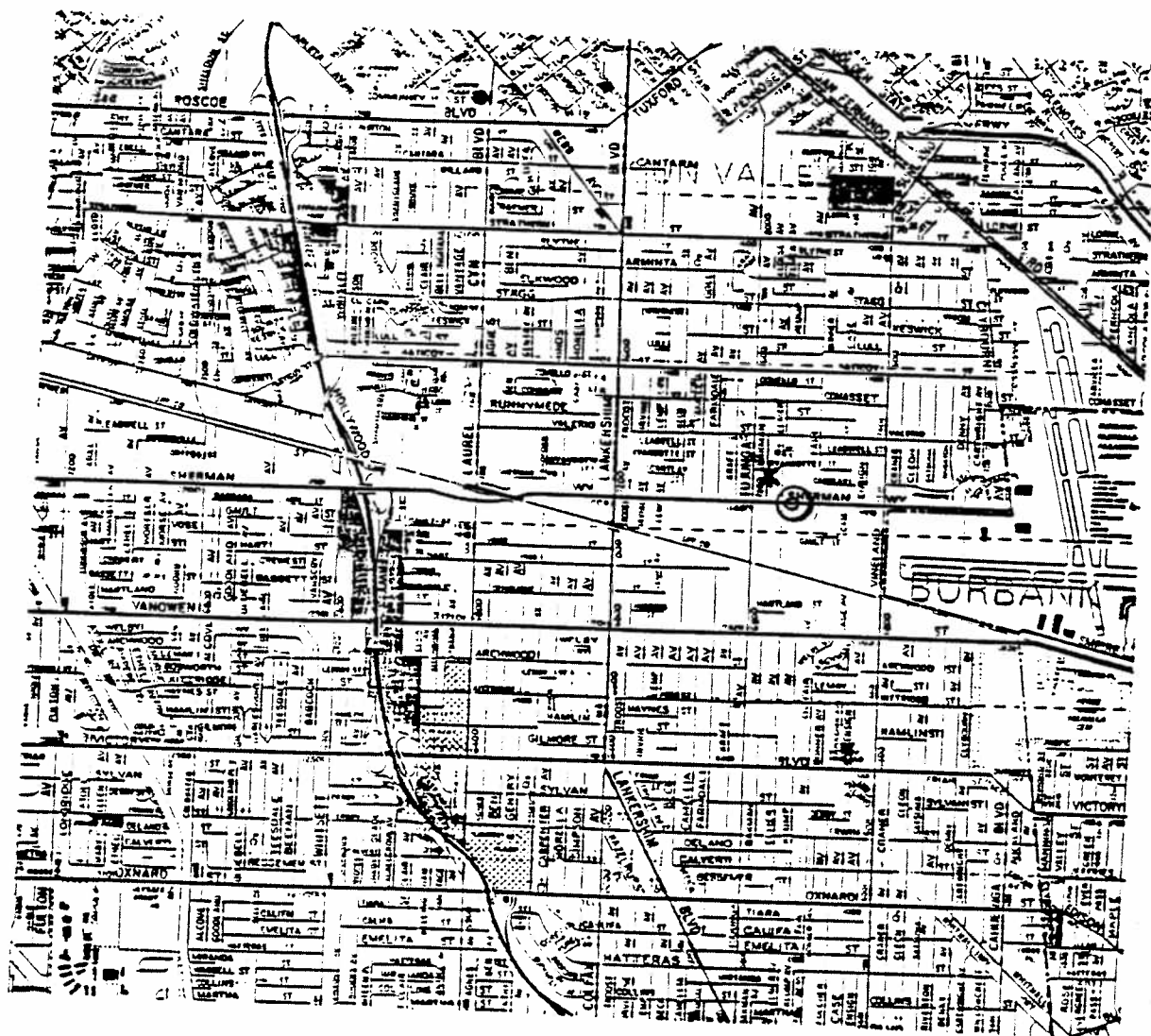
Variations in the soil and groundwater may exist beyond the points examined herein. Changes in groundwater conditions may occur in the future due to variations in rainfall, regional water usage, or other factors not apparent at the time this field investigation was performed.

These services performed by ACTIVE LEAK TESTING, INC. have been conducted in a manner consistent with the level of care and skill ordinarily exercised by members of our profession currently practicing under similar conditions in the Los Angeles County area. No other warrant, expressed or implied, is made.

FIGURES

SITE LOCATION MAP

SCALE PLOT PLAN



* WATER WELL # 4929
 elevation - 746.0 feet
 depth to ground water - 265.1 feet
 date last measured - 10/28/89



ACTIVE LEAK TESTING, INC.

name of the contractor system
 1300 South Mission St., Suite 120
 San Diego, California 92101

DATE

5-20-89

PAGE

CUSTOMER: HAWKER PACIFIC

SITE 11310 SHERMAN WAY



SHERMAN WAY

BUILDING 1

AWNING

ALLEY

BUILDING 2

B.3
20° ANGLE

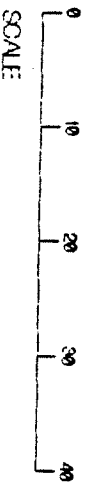
SNAP

B.1
18° ANGLE

B.2
21° ANGLE

CONTAMINANT AREA

280 GAL.
WASTE OIL.



ACTIVE LEAK TESTING

DATE:

0.12.90

APPROVED BY:

DATE:

VJM

REMOVED

HAWKER PACIFIC
11310 SHERMAN WAY

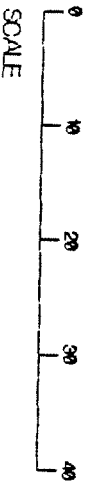
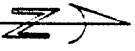
DRAWN BY:
HAWKER PAC

280 GAL.
WASTE OIL

SUMP

23' 3"

15°
20°
25°



ACTIVE LEAK TESTING

DATE		APPROVED BY:		DRAWN BY:	
6.12.90				VJM	
HAWKER PACIFIC					
11310 ST. EMMA WAY					
PROPOSED LOCATION FOR BCGRINGS					
DRAWN BY: 1P2					

APPENDIX 1

SOIL BORING PROTOCOL

Soil Boring Protocol

Active Leak Testing, Inc. (ALT) practices the following procedures for soil borings. The practice is under supervision of a State of California Registered Geologist. These practices are followed to insure the integrity of the information supplied by ALT upon completion of an investigation.

Preparation

1. The Underground Service Alert will be informed of the intention to bore at least 48 hours in advance.
2. The Project Manager will establish a safety zone in the area of the drill rig by use of traffic barriers, traffic cones or safety tape. No unauthorized person or persons without proper safety equipment shall enter this zone.
3. EM search the area for piping and conduit.
4. An appropriate ($<1"$) diameter hole is cored through the existing concrete or asphalt pavement at the desired boring location.
5. The subsurface soil is probed, with a metal rod, to a depth of three to four feet.
6. Surface pavement is cored to 9" or 12" diameter.

Borings

1. The Project Manager supervises the boring procedure to insure that the soil boring is conducted in a proper manner and that no unnecessary risks are taken.
2. The Project Manager supervises the personnel to insure that proper safety equipment is worn at all times when within the safety zone.
3. Soil borings are performed by truck mounted drilling rigs utilizing continuous flight, 6 to 12 inch hollow stem augers.
4. Should a subsurface obstacle be encountered, the boring is halted, the auger is removed and the soil is probed for indications of piping or tanks etc. If the nature of the object is undeterminable the boring will be halted and the hole abandoned.
5. The Project Manager or Geologist maintains a boring log to record descriptions of the lithology penetrated by the boring. All changes in lithology are noted and soil types are

described utilizing the Unified Soil Classification System (USCS).

6. Soil sampling is conducted following specific protocol for the project.
7. When water is unexpectedly encountered the boring shall be discontinued. We do not bore beyond 5' into a tight clay layer under normal circumstances. For water well installations - see WW protocol.

Quality Control

1. In order to avoid contamination from a previous site, the boring equipment and augers are steam cleaned prior to delivery to the site.
2. When multiple borings are required a clean set of augers is used for each boring location. If augers need be reused they are washed with Tri-sodium Phosphate (TSP) soap and rinsed with clean water. Then steam cleaned before use.
3. Soil brought to the surface during the boring process is placed in new DOT 55 gallon drums, covered and stored for proper disposal within 60 days.

Completion of boring

No risk to water.

1. For discovery borings which are not to be converted to wells the well is closed by grouting through the hollow stem auger with a mixture of concrete and bentonite (5 to 1). A bottom plug for 1 to 2 feet is followed by sand or soil used to fill boring to about 5 feet below grade. A surface cap is then placed with the grout and a 1 to 2 feet surface cap of concrete finished flush with the surface.

For potential risk to water.

2. The boring is grouted from the bottom with the bentonite concrete mixture; preferably by use of a tremmie so bridging is avoided. A concrete cap/ 2 ft. thick at the surface.

APPENDIX 2

UNIFIED SOIL CLASSIFICATION SYSTEM / BORING LOGS

DISCOVERY WELL NO. B1 CONSTRUCTION		CHEMICAL ANALYSES LABORATORY FIELD		DEPTH (feet)	INTERVAL	BLOWCOUNT	SAMPLE NO.	LITHOLOGY SYMBOL	USCS DESIGNATION	SOIL DESCRIPTION
				0						
TIME	10:50			5	13/25			SP		LT. BROWN ROCKY SAND very POORLY graded moist micaceous NO ODOR
	11:07			10	27/41			SP		LT. BROWN ROCKY SAND very POORLY graded TRACE VERY LARGE STONES (QUARTZ & GRANITE) micaceous NO ODOR
	11:30			15	21/25			SP		SAME AS 5'
	11:40			20	17/22			SP		SAME AS 5'
				25						
				30						
				35						
				40						

NOTES: X DRILLED TO SAMPLE UNDER TANK @ 18°

SURFACE ELEVATION: —	DIAMETER OF BORING: 8"	TOTAL DEPTH: 40' 20"	WATER FOUND AT: —	DATE DRILLED: 24 APR 90
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ACTIVE LEAK TESTING, INC.
 San Pedro, California 90731

CUSTOMER: HAWKER PACIFIC SITE: OLD W/O TANK	
LOGGED BY: Wm J. Brown	DATE: 24 APR 90
LOG OF BORING PAGE:	

DISCOVERY WELL NO. B2 CONSTRUCTION	CHEMICAL LABORATORY	ANALYSES		DEPTH (feet)	INTERVAL	BLOW COUNT	SAMPLE NO.	LITHOLOGY SYMBOL	U.S.C.S. DESIGNATION	SOIL DESCRIPTION
		LABORATORY	FIELD							
TAMPER PROOF WELL COVER PVC CAP CEMENT BITUMEN SEAL SLOTTED PVC PEA GRAVEL				0						LT BROWN, ROCKY SAND. very poorly graded, micaceous, moist NO ODOOR
TIME 12:30				3 1/2	1 1/2					
12:45				9	19			SP		SAME AS ABOVE
1:00				10	28					
				15				SP		SAME AS ABOVE
1:15				20				SP		SAME AS ABOVE
				25						
				30						
				35						
				40						

NOTES:

* DRILLED TO SAMPLE UNDER Bldg. $\theta = 21^\circ$


SURFACE ELEVATION:	DIAMETER OF BORING: 8"	TOTAL DEPTH: 40' 20"	WATER FOUND AT: —	DATE DRILLED: 24 APR 90
ALT ACTIVE LEAK TESTING, INC. San Pedro, California 90731		CUSTOMER: HAWKER PACIFIC		
		SITE: OLD W/O TANK		
LOGGED BY: Wm J. Poon		DATE: 24 APR 90	LOG OF BORING	
			PAGE:	

DISCOVERY WELL NO. B3 CONSTRUCTION	CHEMICAL ANALYSES		DEPTH (feet)	INTERVAL	BLOWCOUNT	SAMPLE NO.	LITHOLOGY SYMBOL	USCS DESIGNATION	SOIL DESCRIPTION
	LABORATORY	FIELD							
TAMPER PROOF WELL COVER			0						
PVC CAP			1						
CEMENT BETONITE SEAL			3	15					DARK GREENISH BLACK sand with TRACE ASPHALT AND OTHER STONES MOIST MICACIOUS Heavy ODOR
SLOTTED PVC			5	15				SP3	LT-med BROWN SAND Poorly graded MICACIOUS moist MODERATE ODOR
PEA GRAVEL			10	19 27				SP5	SAME AS 3' with TRACE STONES AND Light ODOR
			15	24 27				SP10	LT BROWN Sand very poorly graded MICACIOUS moist slight ODOR
			20						
			25						
			30						
			35						
			40					SP	SAME AS 10' with large granite STONES

NOTES:

* DRILLED TO SAMPLE UNDER CATCH BASIN SUM? $\theta = 23^\circ$

SURFACE ELEVATION:	DIAMETER OF BORING: 8"	TOTAL DEPTH: 40' 15"	WATER FOUND AT: —	DATE DRILLED: 24 APR 90
--------------------	---------------------------	-------------------------	----------------------	----------------------------



ACTIVE LEAK TESTING, INC.
San Pedro, California 90731

CUSTOMER: HAWKER PACIFIC
SITE: OLD W/O TANK

LOGGED BY:
Wm. L. B...

DATE:
24 APR 90

LOG OF BORING
PAGE:

Unified Soil Classification System

Major Divisons			Group Symbols	Soil Description
COARSE GRAINED SOIL (More Than 50% Material Larger Than The #200 Sieve)	GRAVEL (More Than 50% Material Larger Than #4 Sieve)	Clean GRAVEL (Less Than 5% Fines)	GW	Well Graded Gravel, Sandy GRAVEL. Must have an equal distribution of Fine and Coarse Gravel.
			GP	Poorly Graded Gravel, Sandy GRAVEL. Gap Graded, little or no Fines.
		GRAVEL With Fines (More Than 12% Fines)	GM	Silty GRAVEL, Silty, Sandy GRAVEL.
			GC	Clayey GRAVEL, Clayey, Sandy GRAVEL.
	SAND (More Than 50% Material Smaller Than #4 Sieve)	Clean SAND (Less Than 5% Fines)	SW	Well Graded Sand, Gravelly SAND. Must have an equal distribution of fine, medium, and coarse Sand.
			SP	Poorly Graded Sand, Gravelly SAND. Gap Graded, little or no fines.
		SAND With Fines (More Than 12% Fines)	SM	Silty SAND, Silty, Gravelly SAND.
			SC	Clayey SAND, Clayey, Gravelly SAND.
FINE GRAINED SOIL (More Than 50% Material Smaller Than The #200 Sieve)	SILT & CLAY (Liquid Limit Less Than 50)		ML	Inorganic SILT, Sandy or Clayey SILT. Low to No plasticity.
			CL	Inorganic CLAY, Sandy or Silty CLAY. Low to Medium plasticity.
			OL	Organic SILT or Organic Silty CLAY. Low to Medium plasticity.
	SILT & CLAY (Liquid Limit More Than 50)		MH	Inorganic SILT, Micaceous or Diatomaceous Sandy SILT, Silty SILT. Medium to High plasticity.
			CH	Inorganic CLAY with High plasticity.
			OH	Organic CLAY & SILT with High plasticity.
			HIGHLY ORGANIC SOIL	

Particle Size Limits

(Sieve Openings in millimeters)									
		.075	.425	2.00	4.75	19.0	75.0	300.0	
SILT & CLAY		SAND			GRAVEL		COBBLES	BOULDERS	
		Fine	Medium	Coarse	Fine	Coarse			
(U.S. Standard Sieve Sizes)									
		#200	#10	#10			3"	12"	

Note: Approximate classification

Note: Borderline classifications may be designated by the use of dual Symbols, ie SP/SM, CL/ML, etc.

APPENDIX 3

SOIL SAMPLING PROTOCOL

Soil Sampling Protocol

The purpose of the soil sample protocol adopted and followed by Active Leak Testing, Inc. (ALT) is to insure the precision and accuracy for the laboratory analyzed chemical data. To create a uniform approach for sampling and quality control, the methods are practiced under supervision of a State of California Registered Geologist.

Sampling

1. During soil boring procedures three 2 1/2 x 6 inch core samples are recovered at 5 foot intervals by use of a split-barrel, modified Porter sampler driven by a 140 pound down hole hammer.
2. The soil sampling interval may be varied based on the field geologists observations of a major change in lithology or if contamination or water is encountered or if the boring extends beyond 20 feet.
3. When contamination is encountered the boring shall continue to a depth of 10 feet below the last indication of contamination.
4. When water is unexpectedly encountered the boring shall be discontinued. We do not bore beyond 5' into a tight clay layer under normal circumstances. For water well installations - see WW protocol.
5. When a boring is to extend beyond 20 feet the samples will be recovered at 5 foot intervals for the first 20 feet and at 10 foot intervals thereafter.

Field Screening

1. The uppermost 6" core sample, recovered at each sampling interval during the sampling process, is placed in a Whirl-Pak plastic bag for field screening.
2. The bag sample is screened for organic vapors with a portable Organic Vapor Analyzer (OVA) for indications of possible soil contamination.
3. OVA readings are taken for each depth as the core samples are recovered and the values are recorded at the appropriate depth. Core selection for laboratory analysis will be based in part, on the vapor concentration.

APPENDIX 4

LABORATORY RESULTS

DIVERSIFIED ANALYTICAL SERVICES

Environmental Laboratory

3732 W. Century Blvd.

Unit 3

Inglewood, CA 90303

(213) 671-5346

Fax: (213) 671-7216

LABORATORY REPORT

Reference: Active Leak Testing - Hawker Pacific Soil Samples

Test Methods: EPA Method 8240 for Volatile Compounds (GC/MS)

Date Received: April 25, 1990

Date Analyzed: April 26 - May 7, 1990

Date Reported: May 14, 1990

Note: See attached document for further information.

ANALYTICAL RESULTS

All Results in ppb Unless Otherwise Specified

Constituent	B3-5
Chloromethane	<5.0
Vinyl Chloride	<5.0
Bromomethane	<5.0
Chloroethane	<5.0
Acetone	<5.0
1,1-Dichloroethylene	<5.0
Methylene Chloride	<5.0
1,2-Dichloroethylene (total)	<5.0
Carbon Disulfide	<5.0
1,1-Dichloroethane	<5.0
Vinyl Acetate	<5.0
MEK (2-Butanone)	<5.0
Chloroform	<5.0
1,1,1-Trichloroethane	6.6
Carbon Tetrachloride	<5.0
1,2-Dichloroethane	<5.0
Benzene	<5.0
Trichloroethylene	19.2
1,2-Dichloropropane	<5.0
Bromodichloromethane	<5.0
MIBK (4-Methyl-2-Pentanone)	<5.0
trans-1,3-Dichloropropene	<5.0
Toluene	550,000
cis-1,3-Dichloropropene	<5.0
1,1,2-Trichloroethane	<5.0
Tetrachloroethylene	553,000
Dibromochloromethane	<5.0
Ethylbenzene	<5.0
Chlorobenzene	<5.0
Xylenes (total)	584
Styrene	<5.0
Bromoform	<5.0
1,1,2,2-Tetrachloroethane	<5.0

Results continued on next page.

Sample Number	Depth (feet)	Component Name	Result (mg/kg)	Detection Limit
B-1	15	TPH	36.3	10.0
B-1	20	TPH	36.3	10.0
B-2	15	TPH	220	10.0
B-2	20	TPH	136	10.0
B-3	1	TPH	38,637	10.0
B-3	3	TPH	22,251	10.0
B-3	5	TPH	3,245	10.0
B-3	10	TPH	17,104	10.0
B-3	15	TPH	354	10.0

TPH = Total Petroleum Hydrocarbons

< = less than; the number following this sign is the detection limit for that specific constituent.

Respectfully Submitted,

Shawn A. Coleman,
Laboratory Director/
Analytical Chemist



ACTIVE LEAK TESTING, INC.
1300 S. BEACON ST. SUITE 120
SAN PEDRO, CALIFORNIA 90731
PHONE (213) 833-8700 FAX (213) 832-9411

CHAIN OF CUSTODY RECORD

PROJECT NUMBER #289 PAGE 1 OF 2
PROJECT NAME HAWKEE PACIFIC DATE 24 APR 90

Laboratory DIVERSIFIED

Address _____

Sample No. / Identification	Sampling		Sample Type			Number of Containers
	Date	Time	Liq.	AIR	SOLID	

8010 / 601	8015 - GAS	8015 - DIESEL	8020 / 602	418.1 TPH	8240 / 624
------------	------------	---------------	------------	-----------	------------

B3	1'	24 APR	2:00			X	1												
B3	3'	24 APR	2:05			X	1												
B3	5'	24 APR	2:10			X	1												
B3	10'	24 APR	2:20			X	1												
B3	15'	24 APR	2:50			X	1												
B1	15'	24 APR	11:30			X	1												
B1	20'	24 APR	11:40			X	1												
B2	15'	24 APR	1:00			X	1												

SAMPLED BY: (PRINT) _____ RECEIVED BY: (PRINT) _____ DATE _____ TIME _____

William L. Loose

RELINQUISHED: (PRINT) _____ RECEIVED BY: (SIGNATURE) _____ DATE _____ TIME _____

RELINQUISHED: (PRINT) _____ RECEIVED BY: (SIGNATURE) _____ DATE _____ TIME _____

RELINQUISHED: (PRINT) _____ RECEIVED BY: (SIGNATURE) _____ DATE _____ TIME _____

METHOD OF SHIPMENT BLUE ICE - AUTO

SPECIAL INSTRUCTIONS

NOTES



ACTIVE LEAK TESTING, INC.
1300 S. BEACON ST. SUITE 120
SAN PEDRO, CALIFORNIA 90731
PHONE (213) 833-8700 FAX (213) 832-9411

CHAIN OF CUSTODY RECORD

PROJECT NUMBER # 289 PAGE 2 OF 2
PROJECT NAME HAWKEE PACIFIC DATE 24 APR 90

Laboratory DIVERSIFIED
Address _____

Sample No. / Identification	Sampling		Sample Type			Number of Containers	8010	8015	8015	8020	418.1	8240		
	Date	Time	Liq.	AIR	SOLID									
B2 20'	24 APR	1:15			X	1					X			

SAMPLED BY: (PRINT)	SAMPLED BY: (SIGNATURE)	RECEIVED BY: (PRINT)	RECEIVED BY: (SIGNATURE)	DATE	TIME
William L. Loser	<i>W. Loser</i>				

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RELINQUISHED: (PRINT)	RELINQUISHED: (SIGNATURE)	LABORATORY (PRINT)	LABORATORY (SIGNATURE)	DATE	TIME

METHOD OF SHIPMENT	NOTES
BLUE ICE - AUTO	

SPECIAL INSTRUCTIONS

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Bromoform	<5.0
1,1,2,2-Tetrachloroethane	<5.0

Results continued on next page.

2166-03161

**EXHIBITS TO RESPONSE OF HAWKER PACIFIC INC.
TO EPA REQUEST FOR INFORMATION
PURSUANT TO CERCLA § 104(e)
(INCLUDING CONFIDENTIAL INFORMATION)**

VOLUME II of II

Exhibits 13-25

LA911620.009

INDEX OF EXHIBITS TO RESPONSE OF HAWKER PACIFIC INC. TO EPA
REQUEST FOR INFORMATION PURSUANT TO CERCLA § 104(e)
(INCLUDING CONFIDENTIAL INFORMATION)

<u>Number</u>	<u>Description</u>
1.	Lease from Wagner and Bassinger to Hawker Pacific (Building 1, 2 and 3)
2.	Lease from Industrial Bowling to Hawker Pacific (Building 5).
3.	Lease from Industrial Bowling Corp. to Hawker Pacific
4.	Sealed map of facility.
5.	Law Environmental, Inc. Report (January 4, 1989).
6.	Law Environmental, Inc. Report (August 22, 1989).
7.	Law Environmental, Inc. Report (January 11, 1990).
8.	Law Environmental, Inc. Report (November 26, 1990).
9.	Law Environmental, Inc. Work Proposal (May 22, 1991).
10.	Material Safety Data Sheets
11.	Hazardous Waste Manifests
12.	Sewer Permit
13.	Insurance Policies (1986-1987).
14.	Insurance Policies (1987-1988).
15.	Insurance Policies (1988-1989).
16.	Insurance Policies (1989-1990).
17.	Insurance Policies (1990-1991).
18.	1988 Federal Tax Return.

19. 1989 Federal Tax Return.
20. 1988 Hawker Siddeley Annual Report.
21. 1989 Hawker Siddeley Annual Report.
22. 1990 Hawker Siddeley Annual Report.
23. 1989 Hawker Pacific Financial Statements.
24. Articles of Incorporation.
25. By-Laws.

LA911650.030

FX-4: CBI/Trade Secret

FX-4: CBI/Trade Secret

FX-4: CBI/Trade Secret

FX-4: CBI/Trade Secret

FX-4: CBI/Trade Secret

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